

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDERAL TRADE COMMISSION,
Plaintiff,

vs.

MATCH GROUP, INC., a corporation, and
MATCH GROUP, LLC, formerly known as
MATCH.COM, LLC, a limited liability
company,

Defendants.

Case No. 3:19-cv-02281-K

**DECLARATION OF DUSHYANT SARAPH IN SUPPORT OF
SUPPLEMENTAL MOTION TO SEAL ADDITIONAL DOCUMENTS**

I, Dushyant Saraph, declare as follows:

1. I serve as the General Manager of Match, for Match Group Americas, LLC, which currently owns and operates Match.com. Match.com was formerly owned and operated by Defendant Match Group, LLC (“MGL”).

2. I am over the age of 18 and competent to make this Declaration. The statements contained in this Declaration are based on my personal knowledge, as well as on the information made available to me in my official capacity as General Manager of Match. If called and sworn as a witness, I would and could testify competently to the matters set forth herein.

3. This Declaration is being made in support of Defendants MGL and Match Group Inc. (“MGI,” and collectively, the “Defendants”) Unopposed Supplemental Motion to Seal Additional Documents (the “Supplemental Motion”).

4. Defendants seek to maintain the confidentiality of limited portions of documents filed under seal by the parties that reflect (1) personally identifiable information of Match.com

customers, (2) detailed non-party dating site business metrics, and (3) detailed Match.com business metrics.

(1) Personally Identifiable Information

5. Defendants seek to redact a Match.com customer's personally identifiable information, including credit card information.

6. Match.com takes user privacy seriously. As stated in Match.com's Privacy Policy, privacy is a top priority of Match.com.

7. Defendants' proposed redaction is narrowly tailored to protect Match.com's customers' privacy.

8. A proposed redaction of a customer's personally identifiable information is located in the following filing and is described in item-by-item detail in the sealed Exhibit attached to Defendants' Supplemental Motion ("Exhibit"):

- Dkt. 199-10, ECF p. 1167
 - Plaintiff's Appendix ISO MSJ APP-4665

(2) Detailed Non-Party Dating Site Business Metrics

9. Defendants seek to redact a non-party dating site's confidential business information, such as chargeback information.

10. This information was provided to Defendants confidentially, in conjunction with a potential acquisition (which later closed). This information is not publicly available and is the type of information that is valuable to dating sites. It is the same type of information that Defendants spend considerable time and money creating and maintaining privately in their own business.

11. Defendants' proposed redactions are narrowly tailored to protect the non-party dating site's confidential business information.

12. Confidential business information is requested to be redacted in the following filings, and such redactions are described in item-by-item detail in the sealed Exhibit:

- Dkt. 199-10, ECF p. 1197, 1200
 - Pltf's Appendix ISO of MSJ APP-4695, 4698

(3) Detailed Match.com Business Metrics

13. Defendants seek to redact confidential business information, such as business metrics, customer demographic information, and internal data and analysis.

14. Match.com's confidential business information is valuable to Match.com and not publicly available.

15. Match.com spent considerable time and money creating such data and maintaining its confidentiality.

16. A competitor with such unredacted data could use it to its own advantage, and public disclosure of Match.com's confidential business information would put Match.com at a competitive disadvantage.

17. Defendants' proposed redactions are narrowly tailored to protect Match.com's confidential business information.

18. Confidential business information is requested to be redacted in the following filings, and such redactions are described in item-by-item detail in the sealed Exhibit:

- Dkt. 199-10, ECF p. 288, 289, 291, 292, 295, 1192, 1193, 1198
 - Plaintiff's Appendix ISO MSJ APP-3790, 3791, 3793, 3794, 3797, 4690, 4691, 4696
- Dkt. 226, ECF p. 4, 5, 6

- Defendants' Appendix ISO Response to Plaintiff's Motion in Limine to Exclude Expert Testimony of James Langenfeld APP-37, 38, 39

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 6, 2024.

Signature: _____

DocuSigned by:

Dushyant Saraph

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